

THE SMITH FIRM
ATTORNEYS

1541 CORPORATE WAY, SUITE 100
SACRAMENTO, CA 95831
(916) 442-2019

WWW.THESMITHFIRM.COM

November 2, 2005

BY FAX AND MAIL

Ms. Cheryl Hawkins
Sacramento County Dept. of Environmental Management
8570 Jackson Road, Room 240
Sacramento, CA 95826

RE: Request for appeal hearing; revised facility permit; Sacramento County
North Area Recovery Station (NARS)

Dear Ms. Hawkins:

Pursuant to California Public Resources Code §44307, the Coalition for Alternatives to Kiefer Landfill requests a hearing on the appeal of the issuance of a solid waste facility permit revision for the Sacramento County North Area Recovery Station (NARS).

The issues directed to appeal include the following:

1. Improper issuance of "emergency" permits by LEA.
2. Selective enforcement and lack of enforcement by LEA.
3. Failure to properly require environmental review of project approvals.
4. Conflicts of interest between County and LEA.

Furthermore, pursuant to the Public Records Act, please make available all documents and records related to the NARS, including but not limited to all inspection and enforcement actions for the past five year, notice and orders since 1995, and all correspondence in your agency's possession related to the facility.

Thank you for your attention to this matter.

Sincerely,

KELLY T. SMITH